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June 10, 2021

Application GRANTED.

*Via ECF*

Honorable P. Kevin Castel  
United States District Judge  
United States Courthouse  
500 Pearl Street, Courtroom 11D  
New York, NY 10007

SO ORDERED.  
6/11/2021



P. Kevin Castel  
United States District Judge

*Re: Dame Products v. The Metropolitan Transportation Authority, et al.,*  
Case No. 19 Civ. 05649 (PKC)

Your Honor:

We represent Plaintiff Dame Products in the above-captioned matter. We write jointly with counsel for Defendants to respectfully request an extension of time from June 11, 2021 to July 12, 2021 for the parties to file pre-motion letters in anticipation of moving for summary judgment; and an extension of time from July 2, 2021 to August 2, 2021 for the parties to complete expert discovery. Four previous requests for an extension of the pre-motion letter deadline were made and granted. *See* Dkt. Nos. 53, 55, 57 and 59. Five previous requests for an extension of the expert discovery deadline were made and granted. *See* Dkt. Nos. 38-39, 40, 42, 55, 57 and 59.

The parties request these extensions because of their ongoing substantive settlement discussions. The parties have made substantial progress and are close to a settlement agreement, but need additional time to complete all necessary aspects of the agreement. Given the status of continued negotiations, the parties continue to believe it is preferable to devote resources to settlement conversations than to expend them on expert discovery or summary judgment pre-motion papers.

For the foregoing reasons, the parties respectfully request that the Court extend the deadline to file pre-motion letters in anticipation of moving for summary judgment to July 12, 2021; and extend the deadline to complete expert discovery to August 2, 2021.

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Respectfully submitted,

/s

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c. All counsel of record, *via ECF*